

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOSHUA ADAM SCHULTE,

Petitioner,

-against-

WARDEN, METROPOLITAN DETENTION
CENTER (MDC),

Respondent.

**DECLARATION OF KEEGAN
STEPHAN IN SUPPORT OF MR.
SCHULTE’S PETITION FOR A WRIT OF
HABEAS CORPUS**

22-CV-766 (EK)

I, Keegan Stephan, declare that the following is true, under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am admitted to the New York State Bar and the United States District Court for the Eastern District of New York. I am an associate with the law firm of Beldock Levine & Hoffman, LLP. We represent Petitioner Joshua Adam Schulte in the above-captioned matter.

2. Mr. Schulte is being detained at the Metropolitan Detention Center (“MDC”) under special administrative measures (“SAMs”). As a result, it is difficult to communicate with Mr. Schulte or obtain his signature on legal documents. It is hard to speak with him on the telephone or visit him in person, and all in-person visits are non-contact.

3. Attached as Exhibit 1 is an unsigned declaration of Joshua Adam Schulte. I drafted that declaration with Mr. Schulte through conversations during multiple in-person visits and telephone calls. On November 17, 2023, I attempted to visit Mr. Schulte to have him sign the declaration. However, I was not allowed into the MDC because the facility was on lockdown. Instead, I spoke with Mr. Schulte over the phone. I read every paragraph of the declaration to him over the phone, and he verbally affirmed, under penalty of perjury, that the substance of every

paragraph is true and correct. I will attempt to obtain a signed copy of this declaration and then provide it to the Court as soon as possible. Until then, I respectfully request that the Court consider this unsigned declaration in conjunction with the pending petition for a writ of habeas corpus.

4. Attached as Exhibit 2 is a copy of the 2023 SAMs imposed upon Mr. Schulte, as provided to me by the Government.

I certify under penalty of perjury that the above is true and correct.

Dated: November 17, 2023
New York, New York



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